

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANGELA ROBERTS,

Plaintiff,

- against -

UNLOCK PARTNERSHIP SOLUTIONS
AO1, INC., CLEAR EDGE TITLE INC.,
ABC INC 1 – 10, AND JOHN DOE 1-10,

Defendants.

Case No.: 24-cv-01374-CPO-AMD

**DEFENDANT UNLOCK PARTNERSHIP SOLUTIONS AO1 INC.’S
MOTION TO COMPEL ARBITRATION**

AND REQUEST FOR ORAL ARGUMENT

Defendant Unlock Partnership Solutions AO1, Inc. (“Unlock”), by counsel, and pursuant to the Court’s April 4, 2025 Order [Dkt. No. 81], shall move this Court, before the Honorable Christine P. O’Hearn, J.S.C., at the United States District Court for the District of New Jersey, Mitchell H. Cohen Federal Courthouse, 4th & Cooper Street, Camden, NJ 08101, Courtroom 5A, on **July 21, 2025**, or as soon thereafter as counsel may be heard, for an Order compelling arbitration concerning all claims asserted by Plaintiff Angela Roberts against Unlock in this action, for the reasons set forth in the accompanying Memorandum. A proposed order of dismissal is also attached hereto.

May 5, 2025

**UNLOCK PARTNERSHIP SOLUTIONS
AO1 INC.,**
By Counsel,

/s/ Jason R. Lipkin, Esq.

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(admitted *pro hac vice*)

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